

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

JUL 24 2000

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
Numbering Resource Optimization)
)

CC Docket No. 99-200 /

To: The Commission

Request for Extension of Time

Puerto Rico Telephone Company, Inc. ("PRTC") and Celulares Telefónica, Inc. ("CTI") (together, the "Companies"), by their undersigned attorneys and pursuant to Section 1.46 of the Commission's Rules,¹ request an extension of time to file the Numbering Resource Utilization/Forecast Report, FCC Form 502, as required by Section 52.15(f)(6)(i) of the Commission's rules² and the Commission's Report and Order and Further Notice of Proposed Rulemaking ("Report and Order") issued in the captioned proceeding.³ Specifically, the Companies request a 120-day extension, until November 28, 2000, to file FCC Form 502. Grant of this request will serve the public interest by ensuring that the information delivered to the North American Numbering Plan Administrator ("NANPA"), the Commission, and the local commission is in a useful format and as accurate as possible.

¹ 47 C.F.R. § 1.46. This request also satisfies the standard for grant of a temporary waiver pursuant to Section 1.3 of the Commission's rules. As demonstrated herein, unique circumstances justify the waiver, and grant of the waiver will serve the public interest. See Northeast Cellular Tel. Co. v. FCC, 897 F.2d 1164, 1166 (D.C. Cir. 1990); WAIT Radio v. FCC, 418 F.2d 1153, 1159 (D.C. Cir. 1969).

² 47 C.F.R. § 52.15(f)(6)(i).

³ Numbering Resource Optimization, Report and Order and Further Notice of Proposed Rulemaking, 15 FCC Rcd 7574 (2000).

No. of Copies rec'd 0+4
List A B C D E

In the Report and Order, the Commission adopted mandatory reporting requirements regarding utilization and forecast data by carriers that receive numbering resources from NANPA. The first report, a compilation of data for January 1, 2000 through June 30, 2000, is due on August 1, 2000. These new reporting requirements require that information be reported by NPA in thousand number blocks, which is much more detailed than previous reporting requirements. Even though the reporting requirements are changing significantly, the Companies note that carriers have had little time to review the format of FCC Form 502 and to develop the programming necessary to collect, process, and submit the data in a format that is useful to NANPA.⁴ Indeed, the short notice period has left NANPA itself little time to implement the processes necessary for collecting and processing this data. Against this background, the North American Numbering Counsel (“NANC”) has requested that the Commission “carefully consider the potential negative impacts of this information on the timeliness and usefulness of the COCUS data.”⁵ Once the required processes are established, however, it is not clear that the current definitions of each of the five categories of numbers — assigned, intermediate, reserved, aging, and administrative — will remain the same once the Commission addresses pending petitions for reconsideration filed in the proceeding.

In addition to these general impediments, PRTC and CTI face unique circumstances in gathering and producing the data necessary to complete FCC Form 502 in an accurate manner. On August 26, 1999, PRTC began the process of implementing a new billing system, a project

⁴ The Office of Management and Budget did not approve the data collection form until July 5, 2000 (65 Fed. Reg. 41461), and Section 52.15(f) governing the reporting requirements did not go into effect until July 17, 2000. (65 Fed Reg. 43251).

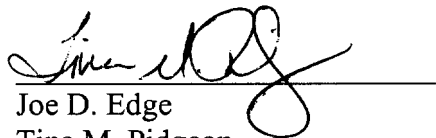
⁵ Letter from John R. Hoffman, NANC Chair, to Lawrence C. Strickling, Chief, Common Carrier Bureau (June 21, 2000).

having significant impact on PRTC and CTI's access to numbering data. This undertaking has affected the Companies' ability to collect remotely and electronically the data necessary for the report. For example, they cannot rely on PRTC's billing system, as they otherwise would, to develop data on assigned numbers. Instead, PRTC and CTI employees must gather the data manually from non-centralized reports generated for 86 wire centers for PRTC and on an island-wide basis for CTI. The same difficulty arises for quantifying aging numbers. In this regard, PRTC and CTI present unique circumstances in support of an extension of time or temporary waiver of the filing date in Section 52.15(f)(6)(i).

Grant of the request will also serve the public interest. PRTC and CTI employees are in the midst of the manual process required to collect the data, but it is clear that all the data cannot be reliably collected through this method prior to the August 1, 2000 filing date. Providing accurate data is necessary to ensure that the goals of the Numbering Resource Optimization will be satisfied, so a brief extension of time to complete the inaugural report will serve the public interest. Based on efforts to date, the Companies estimate that that an additional 120 days is required to complete the FCC Form 502.

For these reasons, PRTC and CTI respectfully request an additional 120 days to collect the required data and prepare its filing. This approach serves the public interest because it will ensure a more accurate report given that for their initial respective reports, PRTC and CTI must rely on the manual collection of numbering resource data.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Tina M. Pidgeon", is written over a horizontal line.

Joe D. Edge
Tina M. Pidgeon
DRINKER BIDDLE & REATH LLP
1500 K Street, N.W., Suite 1100
Washington, D.C. 20005
(202) 842-8800
(202) 842-8465 (fax)

Attorneys for
PUERTO RICO TELEPHONE COMPANY, INC.
And CELULARES TELEFONICA, INC

July 24, 2000

CERTIFICATE OF SERVICE

I, Tina Pidgeon, hereby certify that on this 24th day of July, 2000, I have caused a copy of the foregoing "Request for Extension of Time to be hand-delivered to the following:

Magalie Roman Salas, Secretary
Federal communications Commission
12th Street Lobby, TWA-325
Portals II
445 Twelfth Street, S.W.
Washington, DC 20554

Diane G. Harmon, Deputy Chief
Network Services Division
Common Carrier Bureau
Federal Communications Commission
445 12th Street, S.W. – Room 6A-420
Washington, DC 20544

Yog Varma, Deputy Bureau Chief
Common Carrier Bureau
Federal Communications Commission
445 Twelfth Street, S.W. – Room 5C-352
Washington, DC 20554

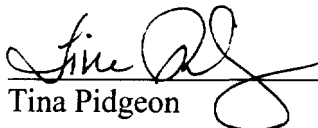
L. Charles Keller, Chief
Network Services Division
Common Carrier Bureau
Federal Communications Commission
445 12th Street, S.W. – Room 6A-420
Washington, DC 20544

David L. Furth, Senior Legal Advisor
Office of the Bureau Chief
Wireless Telecommunications Bureau
Federal Communications Commission
445 Twelfth Street, S.W. – Room 3C-207
Washington, DC 20554

Internal Transcript Service, Inc.
1231 20th Street, N.W.
Washington, DC 20554

Cheryl Callahan, Attorney Advisor
Network Services Division
Common Carrier Bureau
Federal Communications Commission
445 12th Street, S.W. – Room 6A-331
Washington, DC 20544

Aaron Goldberger, Attorney Advisor
Network Services Division
Common Carrier Bureau
Federal Communications Commission
445 12th Street, S.W. – Room 6A-207
Washington, DC 20544


Tina Pidgeon